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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

vs.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF JESSYCA
FREDERICK IN SUPPORT OF
ADVERTISER PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

DATE: December 14, 2023
TIME: 10:00 a.m.
DEPT. 11, 19th Floor
Hon. James Donato

1 I, Jessyca Frederick, declare and state as follows:

2 1. I am a named Advertiser Plaintiff in the above-captioned litigation.

3 2. I am a citizen and resident of La Quinta, California.

4 3. I am the principal of Affilious, Inc., a California corporation formed on December
5 30, 2015.

6 4. I am over the age of 18, am personally familiar with, and have personal knowledge
7 of the facts contained herein, which I could and would testify competently thereto.

8 5. I am aware that this class action lawsuit is brought on behalf of Facebook Inc.
9 (“Facebook”) advertisers that have been wronged between December 1, 2016, and December 31,
10 2020.

11 6. Between December 1, 2016, and December 31, 2020, I purchased advertising from
12 Facebook in six different transactions, spending \$1,533.94 through my credit cards to do so.

13 7. During this time period, I also bought \$33.64 worth of Facebook ads, in 30
14 transactions, using Facebook Coupons.

15 8. Between February 2, 2014, and November 30, 2016, I bought advertising from
16 Facebook in 24 different transactions, paying \$3,435.94 through my American Express and Visa
17 credit cards. I understand that these purchases are not within the Class Period proposed for this
18 case.

19 9. On December 15, 2016, I bought advertising from Facebook in a transaction in the
20 amount of \$710.88, paid through my Visa card ending in -4493.

21 10. On December 15, 2016, I bought advertising from Facebook in a transaction in the
22 amount of \$39.68, paid through my Visa card ending in -4493.

23 11. On December 31, 2016, I bought advertising from Facebook in a transaction in the
24 amount of \$529.50, paid through my Visa card ending in -4493.

25 12. On December 31, 2016, I bought advertising from Facebook in a transaction in the
26 amount of \$178.54, paid through my Visa card ending in -4493.

27 13. On January 28, 2017, I bought advertising from Facebook in a transaction in the
28 amount of \$0.34, paid through my Visa card ending in -1470.

1 14. On March 31, 2017, I bought advertising from Facebook in a transaction in the
2 amount of \$75, paid through my Visa card ending in -4493.

3 15. My December 15, 2016, through January 28, 2017 ad buys (listed above) were
4 purchased by me on behalf of Affilious, Inc. My March 31, 2017 ad buy (listed above) was
5 purchased by me on my own behalf.

6 16. I understand that, by this motion for class certification, I am moving to be appointed
7 class representative in this action and for my attorneys, Scott+Scott Attorneys at Law LLP and
8 Bathaee Dunne LLP, to be appointed class counsel. I understand that Advertiser Plaintiffs Katherine
9 Looper; Mark Berney; 406 Property Services PLLC; and Mark Young are also moving to be
10 appointed as class representatives.

11 17. I understand that a class representative is a representative party who acts on behalf
12 of other class members in directing the litigation and I am willing to serve in this capacity alongside
13 the Advertiser Plaintiffs.

14 18. I understand that, as a class representative, I have a duty to prosecute the case
15 vigorously and in the best interests of all class members, which includes reviewing important filings
16 with the Court, consulting with counsel during the course of the litigation, making recommendations
17 as to whether or not to accept a particular settlement offer, and testifying at deposition and trial if
18 called upon to do so. I have already testified at deposition in this case.

19 19. To the best of my knowledge, I have no conflicts of interest with any class member
20 that would prevent me from fairly and adequately representing the best interests of the class. I
21 understand that my compensation in this case will be the same as any other class members except
22 that I may, with Court approval, be reimbursed for my reasonable costs and expenses incurred as a
23 result of my acting as class representative.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 Executed on _____, in La Quinta, California.

DocuSigned by:

26 *Jessyca Frederick*

27 270FB3A1-85704F82

Jessyca Frederick